



52 Lyndon Road
Sutton Coldfield
West Midlands B73 6BS
office@cerda-planning.co.uk
07843 009388

Development Strategy Team
Town Hall
Evreux Way
Rugby
CV21 2RR

26.017/LH
13 March 2026

By Email: localplan@rugby.gov.uk

Dear Planning Team,


Representations to Rugby Borough Council Proposed Submission Local Plan Regulation 19 Consultation on behalf of Davidsons Homes and the landowners with regard to land to the south Coventry Road at Long Lawford (Site ID 316)

Introduction

1. The submission has been prepared by Cerda Planning on behalf of Davidsons Homes in response to the Rugby Borough Council Proposed Submission Local Plan Regulation 19 Consultation to consider if the plan is sound, legally compliant and complies with the Duty to Co-operate.
2. Davidsons Homes are a private, local medium sized housebuilder delivering circa 900 homes per year across the East and South Midlands. They pride themselves on delivering high quality and well-designed homes. This can be seen with the 350 homes delivered by Davidsons at Houlton, where they opened the site. The award-winning street-scene along the frontage and surrounding phases created a desirable entrance which has helped contribute to the success of Houlton.

Land south of Coventry Road, Long Lawford (Site ID 316)

3. Davidsons Homes has an interest in land located to the south of Coventry Road (A428), Long Lawford. The proposed allocation lies immediately south of the existing settlement. Lawford Heath Lane forms the western boundary of the site, with Coventry Road defining the northern edge. To the east and south, the land adjoins open fields. Rugby Town Centre lies 3km to the west. The site lies within the Green Belt and contains a Grade II Listed Building, both of which require sensitive and well-considered design responses.
4. The site measures approximately 19.75 hectares in total and has an indicative capacity of circa 400 dwellings. An extract of the allocation plan is provided below for reference.

Site ID: 316	Site name: Land at Long Lawford
Site area: 19.75ha	Allocation: circa 400 dwellings
<p>Development requirements:</p> <ul style="list-style-type: none"> • Frontages to face Coventry Road and Lawford Health Lane. • Retain and reuse the 19th century L-plan building to the southwest of Avon Lodge if it is found to be of historical interest. • Layout to provide some open space buffer to the listed farmhouse (Avon Lodge) and L-plan building (if retained). • Pedestrian crossing to be provided on Coventry Road to provide a direct connection to the north-south pedestrian route through the Bloor Homes <i>The Brambles</i> development to link to Back Lane and the village centre. • No build area above underground pipeline to be integrated into the overall site layout to produce useable and attractive public space, overlooked by surrounding built form. • Connections with off-site public rights of way to provide a link to Bilton. • Provision of links towards and contributions to the delivery of footpaths and cycle tracks along Coventry Road, including Local Cycling and Walking Infrastructure Plan (LCWIP) Route R63 (A428 Rugby Road, Long Lawford) which connects to Rugby town centre. 	
	

- The allocation comprises land under the control of two landowners. Davidsons Homes is acting on behalf of the landowner for the eastern parcel, as illustrated on the enclosed Masterplan. The site is available now and capable of coming forward within the plan period, making a meaningful contribution to the Council's five-year housing land supply.
- The Masterplan has been carefully structured to ensure the development can be delivered in phases, with the eastern parcel brought forward as Phase 1. Phase 1 includes land identified for non-residential uses, in accordance with the development requirements set out in Site ID 316, a LEAP as well as a new vehicular access from Coventry Road.
- The two landowners are fully aligned in their objective of realising the draft allocation. Should the Council request it, they are willing to sign a Memorandum of Understanding to provide further assurance to the Inspector at Examination that the site is deliverable, can be relied upon, and is capable of contributing meaningfully both within the next five years and across the wider plan period. A comprehensive and phased scheme is entirely achievable, incorporating the required vehicular and sustainable transport connections, non-residential uses, green and blue infrastructure, and appropriate buffering.
- To support the allocation, Davidsons has commissioned a highways consultant (Stantec) to provide a Technical Note to assess the best position for a new access off Coventry Road. A copy of the Site Access General Arrangement is enclosed. As well as highways, other technical assessments have been prepared which cover the entire allocation site. This work has not identified any constraints that would prevent the site from being developed in phases. The Masterplan demonstrates a coherent and integrated approach to the overall scheme, ensuring each parcel can come forward independently, while still forming part of a coordinated and collaborative development.

Plan Making Context

9. The Development Plan is at the centre of planning system with a statutory requirement that planning decisions must be taken in line with the development plan, unless material considerations indicate otherwise. Development Plans are central to setting out the framework for future growth and development in an area, with regards to addressing housing, economic development, community needs, infrastructure as well as the natural environment.
10. The Framework reinforces this principle. Paragraph 15 states that the planning system should be planned, with succinct and up-to-date plans providing a positive vision for the future, including a framework for meeting housing needs.
11. Paragraph 16 of the Framework sets out the principles for preparing local plans.
 - be prepared with the objective of contributing to the achievement of sustainable development
 - be prepared positively, in a way that is aspirational but deliverable.
 - be shaped by early, proportionate and effective engagement between plan-makers and communities, local organisations, businesses, infrastructure providers and operators and statutory consultees;
 - contain policies that are clearly written and unambiguous, so it is evident how a decision maker should react to development proposals;
 - be accessible through the use of digital tools to assist public involvement and policy presentation; and
 - serve a clear purpose, avoiding unnecessary duplication of policies that apply to a particular area (including policies in this Framework, where relevant).
12. Paragraph 36 of the Framework explains that Local Plans and spatial development strategies are examined to assess whether they have been prepared in accordance with legal and procedure requirements and whether they are sound. Plans are 'sound' if they are:
 - Positively prepared – providing a strategy which, as a minimum, seeks to meet the areas objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;
 - Justified – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;
 - Effective – deliverable over the plan period, and is based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and
 - Consistent with national policy – enabling the delivery of sustainable development in accordance with the policies in Framework and other statements of national planning policy, where relevant.
13. Footnote 20 – states that “where this relates to housing, such needs should be assessed using a clear and justified method, as set out in paragraph 62 of the Framework.”
14. Paragraph 62 states that to determine the minimum number of homes needed, strategic policies should be informed by a local housing needs assessment, conducted using the standard method in national planning practice guidance. In addition to the local housing need figure, any needs that cannot be met within neighbouring areas should also be taken into account in establishing the amount of housing to be planned for.

15. Furthermore, the Framework advises on identifying land for homes, in particular Paragraph 72 advises on identifying sufficient land for housing including a mix of sites taking into account their availability, suitability and likely economic viability. “Strategic policy-making authorities should have a clear understanding of the land available in their area through the preparation of a strategic housing land availability assessment. From this, planning policies should identify a sufficient supply and mix of sites, taking into account their availability, suitability and likely economic viability. Planning policies should identify a supply of:
 - specific, deliverable sites for five years following the intended date of adoption; and
 - specific, developable sites or broad locations for growth, for the subsequent years 6-10 and, where possible, for years 11-15 of the remaining plan period.”
16. The Framework recognises (paragraph 73), “small and medium sized sites can make an important contribution to meeting the housing requirements for an area, are essential for and Medium Enterprise housebuilders to deliver new homes and are often built out relatively quickly.”

UK Labour Government

17. In July 2024, the UK Labour Government announced an ambitious target to deliver 1.5 million new homes in England over the current five-year parliamentary term equating to over 300,000 homes per year. This represents a significant increase compared to previous delivery levels of around 221,000 net additional homes annually.
18. To achieve this, the Government has introduced a series of planning system reforms aimed at unlocking land, streamlining processes, and accelerating housing delivery. One of the first major steps came in December 2024, with amendments to the National Planning Policy Framework (NPPF), including the introduction of a ‘grey belt’ designation to release certain Green Belt sites and the reinstatement of mandatory housing targets for Local Plans.
19. On 16 December 2025, the draft NPPF 2025 consultation was published for consultation. The draft NPPF introduces significant reforms aimed at accelerating housing delivery and strengthening the plan-led system, including a requirement for local plans to be prepared and adopted within 30 months. These measures reflect the Government’s ambition to deliver 1.5 million homes over five years and addresses persistent housing shortages. The draft Framework, emphasises, sustainable growth, prioritising brownfield land and edge-of-urban sites, while ensuring plans remain positively prepared, justified and effective in meeting both local and strategic housing needs.
20. In line with the Government’s reforms to streamline the plan-making process, the Duty to Cooperate will be revoked from 25 March 2026. Removing the Duty to Cooperate is intended to avoid unnecessary delays to local plan examinations.
21. These changes to the planning system demonstrate that planning and economic growth are central to the Government’s agenda, with Development Plans positioned as the primary catalyst for delivering its housing objectives.

Regulation 19 Consultation Observations

22. The response to the Regulation 19 Consultation is submitted to assess whether the Local Plan meets the criteria for soundness, to be legally compliant and complies with the Duty to co-operate. For a Local Plan to be deemed 'sound' it must satisfy the four tests outlined in Paragraph 36 of the Framework, which required plans to be (a) positively prepared, (b) justified, (c) effective and (d) consistent with national policy.

Policy S1 Settlement Hierarchy

23. A positively prepared Local Plan must be supported by proportionate evidence and demonstrate that reasonable alternatives have been assessed to identify the most appropriate strategy. The Plan must align with the NPPF by enabling sustainable development and boosting housing supply. Paragraph 69 emphasises the importance of directing growth to sustainable and deliverable locations.
24. The proposed allocation at Site ID 316 sits on the edge of Long Lawford and aligns with the Plan's spatial strategy, which designates Long Lawford as a Main Rural Settlement capable of accommodating a proportionate level of growth. Directing development to the settlement edge accords with national policy, which supports locating new homes where they maintain or enhance the vitality of rural communities and integrate with established development patterns.
25. Long Lawford is appropriately categorised as a Main Rural Settlement due to its sustainable location, and proximity to Rugby (3km to the west). A total of 650 homes are allocated at Long Lawford, this will sustain the village school, deliver new amenities and enhance walking, cycling and public transport. The SA assessed several growth scenarios. The allocations to the south of Long Lawford were the only allocations used as a variable across the growth scenarios. The SA found there to be limited case to be made for scenarios involving non-allocation at Long Lawford, demonstrating that there are exceptional circumstances for Green Belt release here. While alternative growth options were assessed on land outside the Green Belt, these parcels were found to have significant constraints. As a result, the SA identified the most sustainable and deliverable growth strategy as allocating land to the south of Long Lawford.
26. Given its alignment with the spatial strategy, the evidence base, and national policy, the principle of allocating Site ID 316 is sound. It is justified through proportionate assessment of settlement roles and alternatives, effective in contributing to balanced housing distribution, and consistent with national policy in supporting sustainable development. We therefore support its inclusion.
27. Excluding the allocation contradicts the evidence-led approach. The site is adjacent to existing development, free from major constraints, and capable of early delivery. Paragraph 15 of the NPPF highlights the importance of plan-led growth to prevent speculative development in unsustainable locations. Given Rugby's lack of a five-year housing land supply, the risk of unplanned development increases. Allocating land south of Coventry Road would strengthen the Plan's soundness by ensuring controlled, sustainable housing delivery.

S2 Strategy for Homes

28. Rugby's 5-year housing land supply is 4.16 years as set out against the standard method requirement. However, we consider this number to be over ambitious especially with regards to the trajectory applied to the site at Houlton and whether the projections are correct.

R11/0699 – Remainder of Houlton Allocation

29. The council have allocated 3,060 In the Council's Housing Land Supply Position Statement 2025-2030, the council state that *"At Houlton, the site is underway and progressing swiftly with numerous housebuilders on site. There have been rolling submissions of reserved matters for individual parcels within the defined key phases. Construction began at Houlton in the 2017-18 monitoring year. There have been completions in the past eight monitoring years from 2017-18 to 2024-25 at an average annual rate of 239 dwellings per annum. The delivery rate for the remaining dwellings, outside of existing reserved matters applications, has been supplied by the master developer Urban & Civic."*
30. In the Council's Housing Land Supply Position Statement 2022-2027, the Council anticipated that the delivery of the remainder of the allocation would begin with 63 dwellings in 2023/24, followed by 65 dwellings in 2024/25, 80 dwellings in 2025/26 and 153 dwellings in 2026/27.
31. However, the 2024 - 2029 Statement, considered that the delivery of the site will not begin until 2025/26 with just 80 dwellings anticipated, followed by 175 dwellings in 2026/27, 225 dwellings in 2027/28 and 225 dwellings in 2028/29.
32. The updated 2025–2030 Statement pushes delivery back again, programming completions over 2026–2030 (and beyond) a clear pattern of slippage relative to earlier 5YHLS trajectories, indicating considerable ongoing delivery delays at Houlton.
33. Although a Reserved Matters application for 216 dwellings was approved in February 2026 and has been included within the housing trajectory, the trajectory also assumes delivery of a further 80 dwellings in 2026/27 and 175 dwellings in 2028/29. However, the only other live Reserved Matters application was submitted in 2021 and remains undetermined, while the remainder of the allocation expected to contribute to future delivery retains outline permission only. A substantial proportion of this future development approximately 3,873 dwellings still lack Reserved Matters approval. Consequently, there is a significant risk that the projected trajectory will not be achieved.
34. Given ongoing slippage in Council trajectories and the heavy reliance on outline-only phases, there is a material risk that projected delivery rates will not be achieved. In this context, it is essential that more suitable and genuinely deliverable sites such as Land to the south of Coventry Road are incorporated into the Local Plan Review. Doing so would reduce reliance on speculative applications, support a stable land supply, and help achieve long-term growth objectives. Without a robust five-year supply, speculative unallocated proposals will proliferate, undermining the plan-led system, resulting in dispersed, less sustainable development. A planned allocation such as that on land to the south of Coventry Road, would provide a controlled, deliverable, and sustainable alternative.
35. The local plan seeks to deliver 10,812 dwellings over the plan period (2025 – 2042) equal to 636 dwellings per year. This requirement is based on the Government's revised Standard Method (2024) and is robustly supported by the Updated Housing Needs Evidence (2025). We consider the housing requirement to be justified, proportionate, and consistent with national policy. The Plan meets this need through a balanced spatial strategy, distributing growth across a mix of sources, including strategic sites, medium-sized and rural allocations, existing commitments, permissions, and windfall development. A total of 2,886 dwellings is allocated under Policy S6, including Site ID 316. This approach aligns with the evidence base, which

recognises the importance of a pipeline of small and medium-sized sites capable of early delivery. Site ID316, in particular, provides a valuable early contribution to supply, complementing larger strategic sites that have longer led-in times.

36. While the Council has historically demonstrated strong housing delivery regularly exceeding the standard method requirement of 636 dwellings per annum this performance has been achieved through a balanced mix of both large strategic allocations and smaller deliverable sites. However, as set out above, there are significant concerns regarding the deliverability of the remaining outline only phases at Houlton.
37. Given the repeated slippage in Houlton's delivery trajectory and the continued reliance on outline-only phases amounting to over 3,000 dwellings yet to secure reserved matters approval it is prudent for the Council to diversify its supply by identifying additional smaller, readily deliverable sites. The Council cannot reasonably rely on the assumption that the outstanding Houlton units will be fully delivered within the plan period, particularly in light of the delays evidenced across successive Housing Land Supply Position Statements and the limited progress on reserved matters since 2021. Medium sized sites, capable of early delivery and less susceptible to strategic-scale phasing constraints, are essential to ensuring supply resilience and avoiding an increasing dependence on speculative applications outside the plan-led framework.
38. The site to the south of Coventry Road, sits under two ownerships, is free from major technical constraints, with the first phase being actively promoted by Davidsons Homes a housebuilder with a proven track record of high-quality delivery in Rugby and the wider Midlands area. Technical assessments (ecology, highways, drainage, heritage, landscape) are being prepared to support an imminent planning application. This places the site firmly within the NPPF definition of a deliverable site and provides confidence that it can begin contributing to Rugby's housing supply within 2–3 years of adoption, with the following anticipated timeframe at a build out rate of 40 dwellings per annum.
39. Given the borough's current supply deficit, early deliverable sites like this are essential to ensuring the Plan is effective at the outset of the plan period. Early delivery reduces reliance on large strategic sites with significant lead-in time and helps guard against speculative applications in less sustainable locations.
40. As such, with the inclusion of land to the south of Coventry Road, in the Local Plan, the plan meets the positively prepared test in paragraph 35 of the NPPF, which requires local plans to fully address assessed housing requirements.

S6 residential allocations

41. We support allocation ID.316 and consider the development requirements set out to be sound. The criteria are proportionate to the scale and nature of development and appropriately reflect the site's opportunities and constraints. The requirements meet the tests of soundness justified, effective and consistent with national policy and are therefore supported.
42. The proposed quantum of development proposed in allocation ID.316 is proportionate to the settlement's scale and function. The ability of the site to contribute to the five-year housing land supply strengthens the justification for its inclusion, especially given Rugby's current shortfall. A deliverable, policy-compliant site such as land to the south of Coventry Road is essential to maintaining a plan-led approach and avoiding speculative, unplanned development elsewhere. Failure to retain the allocation in the Local Plan risks the plan being found unsound, as it would not present a reasonable, evidence-based approach to meeting housing needs

H1 Housing Mix

43. While the detailed housing mix is set out in the supporting text rather than the policy wording itself which is generally supported as it ensures an appropriate degree of flexibility and avoids over-prescription concern is raised regarding the explicit reference within the policy to the Housing Needs Evidence 2025 evidence document. Embedding a fixed reference point in the policy risks reducing flexibility over the plan period, particularly if the 2025 Housing Needs Evidence becomes out of date or is superseded by refreshed assessments. Whilst the policy does state, 'and any other appropriate local evidence' the exact reference to the 2025 evidence is too rigid.
44. To ensure the policy remains justified and effective throughout the plan period, the wording should allow for the use of the most up-to-date evidence available at the time an application is determined, rather than locking applicants and decision-makers into reliance on a single dated document. It is also recommended that the wording of the policy allows for variations from the identified mix where justified by site-specific circumstances, evidence of local need or viability considerations.

H2 Affordable Housing

45. We consider the affordable housing requirements to be justified, effective, and fully aligned with national policy. They are supported by the robust evidence set out within the Housing Needs Evidence (2025), and the policy appropriately incorporates flexibility through the application of viability assessments.
46. We also support the proposed 70/30 tenure split, which is consistent with and clearly justified by the evidence base.

I1 Transport

47. Active-travel-led development is strongly supported by national policy, and the requirement for safe, convenient and direct routes for walking, wheeling and cycling represents a proportionate and evidence-based expectation. This approach aligns with both national and local transport strategies and demonstrates that the Council has selected a reasonable and appropriate policy direction.
48. This emphasis on sustainable movement further strengthens the justification for allocating Site ID.316, which offers clear opportunities to deliver well-connected routes linking the site to the wider area. The site is well located, the associated infrastructure requirements are realistic, and Site ID.316 can be delivered without major constraints. By evidencing that the allocation can accommodate high-quality active-travel connections, the Plan demonstrates that the site is deliverable, capable of integrating effectively with the Long Lawford and Rugby town, and that the policy can be applied consistently through the decision-making process.

Green Belt

49. While we acknowledge that the Green Belt Assessment identifies land to the south of Long Lawford as making a strong contribution to Green Belt purposes and cannot be considered 'grey belt' we agree with the conclusions of the Green Belt Exceptional Circumstances Topic Paper.
50. The Topic Paper advises that, significant new housing is required which cannot be met solely through brownfield land, higher densities, or redistribution to neighbouring authorities. Non-Green Belt alternatives within the borough are limited and constrained, particularly around Rugby's southern edge, where further allocations would cause landscape harm and over-concentration of growth. In addition, the neighbouring authorities, (South Warwickshire, Nuneaton & Bedworth, Coventry, and North Warwickshire) are unable to accommodate Rugby's unmet need. As such Green Belt release is unavoidable if the council it to meet its housing requirement sustainably.

51. New development must be directed to the most sustainable locations, and although historic growth has largely focused on expanding Rugby town, it is essential that sustainable rural settlements are also considered as part of a balanced spatial strategy. Long Lawford is the fifth highest scoring settlement for public transport and lies very close to Rugby, as such it is inevitable that Green Belt release will be expected in this location.
52. It is considered that exceptional circumstances exist to justify the release of this Green Belt site. Long Lawford's strong sustainability credentials clearly outweigh the fact that the land is not classified as grey belt. It represents a logical and sustainable growth location, directly adjoining the existing settlement, and no suitable grey belt alternatives exist within Long Lawford. The proposed release would also enable the creation of a robust and defensible new Green Belt boundary, while maintaining the separation wedge between Rugby and Long Lawford.
53. We agree that the Topic Paper clearly demonstrates compliance with paragraphs 145–148 of the NPPF, providing proportionate and robust evidence to justify the existence of exceptional circumstances to amend the Green Belt boundary. The assessment sets out a clear rationale for the release of land to the south of Coventry Road, Long Lawford, showing that this location is both necessary and appropriate to support the sustainable delivery of housing to meet the borough's identified needs. Furthermore, this evidence can be relied upon to reinforce arguments that Site ID.316 is soundly based and must be retained in the submitted Local Plan.

Legally Compliant

54. Based on the Regulation 19 Proposed Submission documents published in January 2026; we consider the Rugby Local Plan to be legally compliant. The Plan has been prepared and consulted upon in accordance with the Council's Local Development Scheme and the Statement of Community Involvement, with Regulation 19 consultation material explicitly confirming that the Plan has been shaped through public and stakeholder engagement at earlier stages.
55. The Council has undertaken ongoing engagement with neighbouring authorities and statutory bodies, demonstrating adherence to the Duty to Co-operate. Evidence of this includes documented cross-boundary discussions with Warwickshire County Council and other local authorities, reflected in consultation updates and supporting material.
56. The Plan is also supported by a full Sustainability Appraisal, forming part of the suite of documents published for Regulation 19 consultation and intended for submission to the Secretary of State.
57. Accordingly, we consider the Regulation 19 Rugby Local Plan (2026) to meet the legal compliance requirements necessary for submission to examination.

Complies with the Duty to co-operate

58. The Duty to Co-operate is a legal requirement under the Planning & Compulsory Purchase Act 2004, obliging local planning authorities to work constructively, actively, and on an ongoing basis with neighbouring authorities and prescribed bodies on strategic, cross-boundary matters. The Council must demonstrate that it has engaged early and meaningfully, and that strategic issues affecting more than one authority have been jointly considered.
59. The Rugby Local Plan has been prepared following extensive engagement with residents, businesses, landowners, developers, and site promoters, as well as with neighbouring local authorities.
60. Cross-boundary strategic matters such as housing need and distribution have been addressed. Rugby has historically accommodated unmet housing need from Coventry, and engagement with Coventry and other Warwickshire authorities is documented within the HEDNA and subsequent evidence updates.
61. Furthermore, the Regulation 19 submission documents include a comprehensive Consultation Statement, which summarises how the Council has engaged with all required Duty to Co-operate bodies throughout the plan-making process.

Conclusion

62. In conclusion, these representations demonstrate that Land south of Coventry Road, Long Lawford (Site ID 316) is a highly suitable, sustainable, and deliverable allocation that will make an important contribution to meeting Rugby Borough's housing needs over the plan period. The site is in a strategic location adjoining an existing Main Rural Settlement, is free from major technical constraints. The phased Masterplan confirms that development can come forward in a coordinated, comprehensive manner, with the eastern parcel capable of early delivery and the wider allocation structured to ensure long-term integration with the remainder of the allocation site.
63. The evidence provided clearly supports the inclusion of Site ID.316 as part of a balanced spatial strategy. The site performs strongly against the sustainability criteria in the SA, offers realistic opportunities to enhance active travel connections, and can deliver a high-quality, landscape-led scheme that sensitively responds to the Green Belt and the setting of the listed building. Its early delivery potential is particularly important given the borough's current five-year housing land supply position, and the ongoing slippage identified at Houlton. Incorporating deliverable medium-sized sites such as this is essential to ensure the Plan is effective from the outset and resilient to delivery risks.
64. Retaining the allocation is also consistent with national policy and meets the NPPF tests of soundness. It is positively prepared, providing for identified housing needs; justified, based on proportionate and robust evidence; effective, with a clear and achievable delivery pathway; and consistent with national policy, directing growth to a sustainable edge-of-settlement location that strengthens the vitality of Long Lawford.
65. Finally, the Regulation 19 Local Plan has been prepared in accordance with the relevant legal and procedural requirements. It is supported by a lawful Sustainability Appraisal and clear evidence of constructive engagement with neighbouring authorities and key stakeholders thereby satisfying the Duty to Cooperate.
66. For all of these reasons, we respectfully request that Site ID 316 – Land south of Coventry Road, Long Lawford is retained within the submitted Local Plan, ensuring the Plan moves forward to examination with

a deliverable, sustainable and evidence-led portfolio of allocations capable of supporting the borough's long-term growth needs.

CERDA PLANNING

March 2026

office@cerda-planning.co.uk

Enclosed:

Masterplan

Site Access General Arrangement

Representation Form for Local Plans



Local Plan Publication Stage Representation Form

Ref:

(For
official
use only)

**Name of the Local Plan to which
this representation relates:**

Rugby Borough Council Proposed
Submission Local Plan

Please return to Rugby Borough Council by 5:00pm Friday 13th March 2026
By email to: localplan@rugby.gov.uk with **Proposed Submission Consultation**
in the subject line, OR by post to: Development Strategy, Town Hall, Evreux
Way, Rugby, CV21 2RR.

This form has two parts –

Part A – Personal Details: need only be completed once.

Part B – Your representation(s). Please fill in a separate sheet for each
representation you wish to make.

Part A

1. Personal Details*

**If an agent is appointed, please complete only the Title, Name and Organisation boxes below (if applicable) but complete the full contact details of the agent in 2.*

Title

First Name

Last Name

Job Title

(where relevant)

Organisation

(where relevant)

Address Line 1

Line 2

Line 3

Line 4

Post Code

Telephone Number

E-mail Address

2. Agent's Details (if applicable)

(where relevant)

Part B – Please use a separate sheet for each policy or site you wish to comment on

Name or Organisation:

3. To which part of the Local Plan does this representation relate?

Paragraph	<input type="text"/>	Policy	<input type="text" value="S1, S2, S6, H1, H2, I1,"/>	Policies Map	<input type="text" value="Green Belt"/>
Site ID	<input type="text" value="136"/>				

4. Do you consider the Local Plan:

(1) is Legally compliant	Yes	<input type="text" value="x"/>	No	<input type="text"/>
(2) is Sound	Yes	<input type="text" value="x"/>	No	<input type="text"/>
(3) complies with the Duty to co-operate	Yes	<input type="text" value="x"/>	No	<input type="text"/>

5. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

Please see enclosed representations

(Continue on a separate sheet /expand box if necessary)

6. Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5 above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Please see enclosed representations.

(Continue on a separate sheet /expand box if necessary)

Please note: In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

7. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

No, I do not wish to participate in hearing session(s)

Yes, I wish to participate in hearing session(s)

Please note that while this will provide an initial indication of your wish to participate in hearing session(s), you may be asked at a later point to confirm your request to participate.

8. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

To support the Inspector in assessing legal compliance and soundness

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

All representations received will be submitted to the Planning Inspectorate alongside the Proposed Submission Local Plan and published on the council's website. Personal addresses and email addresses (as distinct from businesses addresses), but not names, will be redacted before representations are published.

The Rugby Borough Council Privacy Notice for Development Strategy is available here:

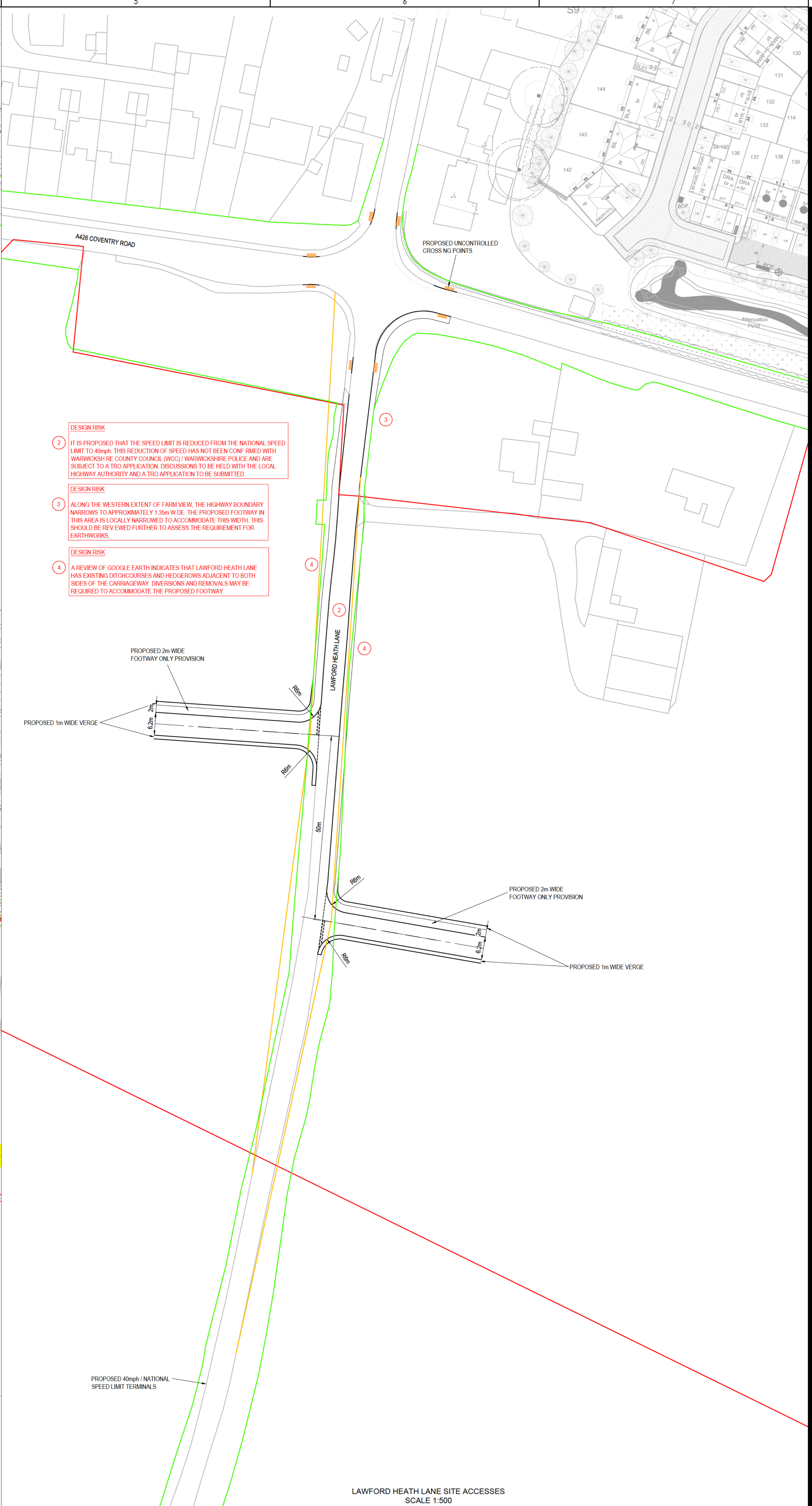
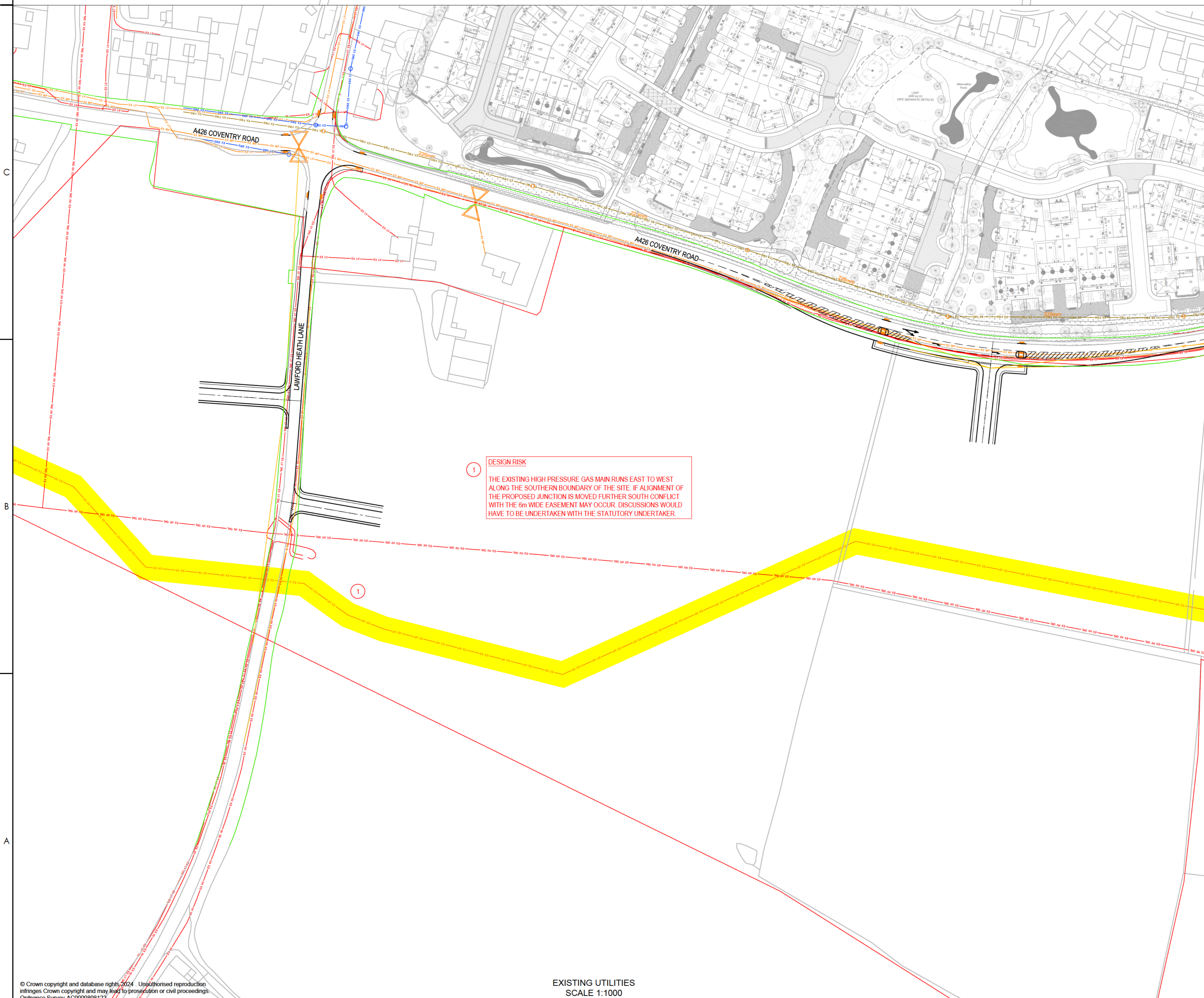
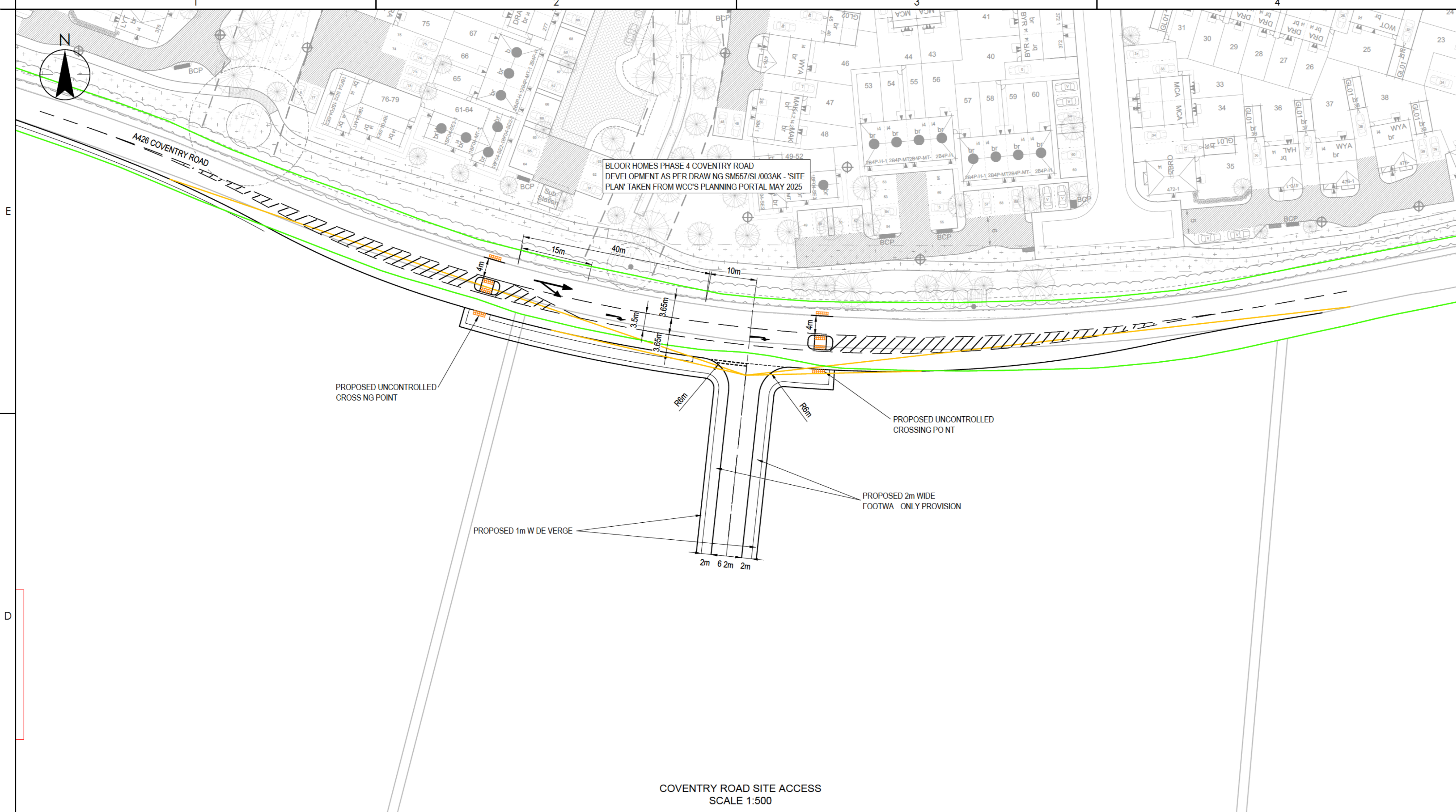
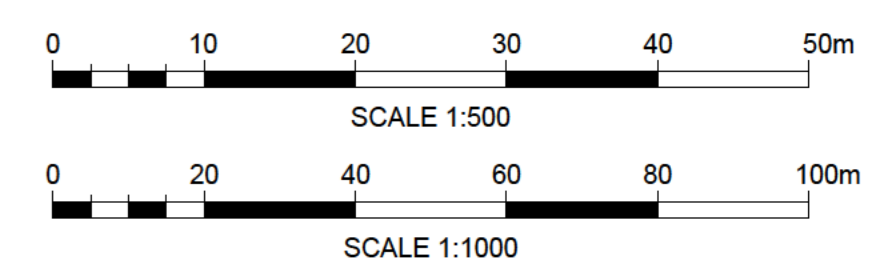
<https://www.rugby.gov.uk/w/privacy#development-strategy>

The Planning Inspectorate's privacy notice can be accessed here:

<https://www.gov.uk/government/publications/planning-inspectorate-privacy-notices>

- KEY:**
- HIGHWAY BOUNDARY
 - SITE BOUNDARY
 - STOPPING SIGHT DISTANCE (SSD) = 120m (DESIGN SPEED 70mph)
- EXISTING UTILITIES KEY:**
- EX SWS — SURFACE WATER SEWER
 - EX FWS — FOUL WATER SEWER
 - EX LV — LOW VOLTAGE ELECTRICITY
 - EX LV OH — LOW VOLTAGE ELECTRICITY OVERHEAD
 - EX HV — HIGH VOLTAGE ELECTRICITY
 - EX HV OH — HIGH VOLTAGE ELECTRICITY OVERHEAD
 - EX LP — LOW PRESSURE GAS MAIN
 - EX MP — MEDIUM PRESSURE GAS MAIN
 - EX HP — HIGH PRESSURE GAS MAIN
 - HIGH PRESSURE GAS MAIN EASEMENT

- NOTES:**
1. ALIGNMENT OF HIGHWAY BOUNDARY BASED ON HIGHWAY BOUNDARY INFORMATION PROVIDED BY WARWICKSHIRE COUNTY COUNCIL (DATED MAY 2025).
 2. FURTHER DEVELOPMENT OF THE SCHEME PROPOSALS, INCLUDING DRAINAGE, UTILITIES AND EARTHWORKS, IS TO BE UNDERTAKEN AT THE DETAILED DESIGN STAGE.
 3. THE DETAILED DESIGN LAYOUT IS TO BE DESIGNED IN ACCORDANCE WITH ALL RELEVANT DESIGN GUIDANCE AND STANDARDS.
 4. DESIGN SPEED FOR COVENTRY ROAD IS BASED ON THE EXISTING SPEED LIMIT OF 40mph.
 5. IT IS PROPOSED THAT THE SPEED LIMIT ON LAWFORD HEATH LANE IS REDUCED FROM THE NATIONAL SPEED LIMIT TO 40mph SUBJECT TO A TRO. THEREFORE, THE DESIGN SPEED IS BASED ON A PROPOSED SPEED LIMIT OF 40mph.
 6. EXISTING UTILITY ALIGNMENT AS PER DAVIDSON'S HOMES DRAWING STRAT-ENG-0150 - CONSTRAINTS AND OPPORTUNITIES PLAN DATED APRIL 2025.
 7. THIS DRAWING SHOULD BE READ IN CONJUNCTION WITH ALL RELEVANT ASSOCIATED DOCUMENTS.





- Key**
- Application site boundary
 - Other land included in the allocation
 - Existing (retained) trees & hedgerow
 - Indicative proposed planting
 - Open space
 - Indicative surface water attenuation basin
 - - - Existing Public Right of Way
 - - - Proposed pedestrian/cycle link
 - ★ Potential for children's play
 - Indicative extent of residential area
 - ★ Potential locations of landmark buildings
 - Non-residential use
 - Proposed street
 - Shared surface street
 - Private drive



nineteen47
 CHARLES TOWN PLANNERS & URBAN DESIGNERS

Project: Coventry Road, Long Lawford
 Drawing Title: Masterplan
 Project Code: n2754
 Drawing No: 005
 Date: 12.03.2026
 Scale: 1:11,000 @ A0